

April 4, 2024

The Honorable Chief Judge Laura Taylor Swain
United States District Court Southern District of New York
500 Pearl Street
New York New York, 10017 -1312

Re : Failure of Estate Auctions Inc.'s Attorney Anderson Duff to email Plaintiff a copy of Doc. 548

To The Honorable Judge Laura Taylor Swain :

Plaintiff respectfully submits my letter to inform and request Your Honor to order Estate Auctions Inc.'s attorney Anderson Duff to email Plaintiff a copy of Doc. 548. Attached as **EXHIBIT #1** is my email inbox documenting WorthPoint's attorneys sent Doc. 547 and not EAI's Doc. 548.

Throughout litigation, Mr. Duff and Estate Auctions Inc. consistently failed to email Discovery and documents filed with the Court to Plaintiff. I remind the Court, the case Discovery due date was April 8, 2022. After a Conference Call with Judge Cave on April 26, 2022, Mr. Duff produced EAI's cut off, alleged 2012 sales receipt from eBay sent to Estate Auctions Inc.'s owner, Norb Novocin. It was stamped April 27, 2022. On June 26, 2022 I noted in the Transcript phone recording in Doc. 245, my request to Mr. Duff to produce a complete copy of EAI sales receipt that was cut off, produced on April 27, 2022. I also reminded Mr. Duff to produce the rest of my Discovery requests. On August 8, 2022, in Doc. 257, I had to file a letter, to inform the Court of EAI delayed responses to Plaintiff's Discovery. This included the full copy of the alleged 2012 sales receipt from eBay sent to owner Norb Novocin. On August 22, 2022, Plaintiff filed Doc. 266, to again inform the Court I requested Discovery responses from attorney Anderson Duff. On Sept. 16, 2022 in Doc. 278, I wrote to Judge Cave with the same request. On Sept. 19, 2022, Judge Cave issued a Memo Endorsement for EAI to produce all EAI's Discovery requests to include one full copy of the alleged 2012 sales receipt from eBay sent to Estate Auctions Inc. owner, Norb Novocin. I note on Sept. 22, 2022, in Doc. 282, Mr. Duff wrote a letter to Judge Cave, falsely stating that all of Plaintiff's Discovery was produced yet failed to send his filed letter with the Court (282) to Plaintiff and also failed to produce the alleged 2012 eBay email. I remind Your Honor, on Nov. 10, 2022, in Doc. 312, I filed a letter with the Court that EAI still did not produce a copy of the alleged 2012 sales receipt from eBay sent to EAI, owner Norb Novocin. On Nov. 17, 2022, EAI finally produced another version the 2012 eBay receipt, however it was different visually. It had other logos and the text was not consistent with first April 27, 2022, 2012 email receipt that was cut off. On Nov. 23, 2022, Plaintiff requested the native electronic email of the the alleged 2012 sales receipt from eBay sent to EAI's owner Norb Novocin. It should be complete and not cut off. The date from eBay and to Norb Novocin and the full content of the 2012 email should have been produced. Last, it is unsurprising, with two more days, Mr. Duff still has not emailed Doc. 548 to Plaintiff. EAI and attorney Anderson Duff willful failure to produce Doc. 548 is a consistent pattern. EAI has delayed or avoided producing filings and evidence, noted to Judge Cave and now needs to be noted to Your Honor, as well.

Please be aware, I have contacted The New York Legal Assistance Group and will be filing my replies to Doc. 547 and Doc. 548 after my legal consultation.

April 4, 2024
Annamarie Trombetta
175 East 96th Street (12 R)
New York, New York 10128

Respectfully Submitted,

————— Electronic Signature —————

/s/ Annamarie Trombetta April 4, 2024

Annamarie Trombetta

Favorites

- Inbox 18
- Sent Items
- Drafts 62
- Add favorite

Folders

Groups

Focused Other

Cahill, John
Plaintiff's request for Doc. ... Tue 1:40 PM
Please find attached Doc. 547, filed by W...

Doc 547.pdf +1

March

Bialek, Adam; Farmer, Jana S.
Plaintiff's March 26, 202... (2) Wed 3/27
I am sorry I missed your message, but it i...

March 26, 2024 L... +1


Bialek, Adam
Plaintiff's Pursuant to Rule ... Wed 3/20
I am sorry I missed your message, but it i...

Plaintiff's Motion ... +15

Older

Cahill, John
Activity in Case 1:18-cv-009... 12/29/2023
Please find attached the Court's Order (E...

show_temp ECF 5...



You're going places. Take Outlook with you for f
Scan the QR code with your phone camera to down
Outlook mobile